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## BACKGROUND:

The registrant is submitting a data package for review of a new product. The non-integrated end-use product is a tablet for sanitization and shock treatment of swimming pool water to reduce the growth of algae and kills bacteria. The product to be used is **DuoTab™** for pool or skimmer.

## FINDINGS:

1. The Product Chemistry Reviewer has received the following documents:
  - Confidential Statement of Formula (CSF), dated 03/15/04, for the basic formulation.
  - A label, undated.
  - A letter, dated 03/15/04.
  - Data matrix, dated 03/15/04, EPA Form 8570-35.
  - Group A - Product Identity, Composition, and Analysis. MRID # 462253-01.
  - Study title "The Chemical and Physical Properties Evaluation of Skimmer Tab D Part 1" MRID #462253-03.
  - Study title "The Chemical and Physical Properties Evaluation of Skimmer Tab D Part 2" MRID #462253-04.
  - Study title "30 - Day Accelerated Stability Evaluation of Skimmer Tab D" MRID # 462253-05.
  - Facsimile, dated 06/29/04.
2. The CSF, dated 03/15/04, for the basic formulation has no supplier names & address for [REDACTED]
3. The CSF does not show what is the active ingredient (AI).
4. The supplier's source, [REDACTED]
5. The CSF shows a wider range for all components. The registrant requested a wider range.
6. The registrant is trying to bridge for odor and color. However, no specific source is referenced for the physical chemistry data on the odor & color.

## Recommendation:

1. The registrant needs to clarify the address of the source, [REDACTED]
2. The registrant needs to specify what is the AI in column 15 of the CSF.
3. The registrant needs to specify the source to bridge for odor. The registered product needs to be the same as the new product.

## CONCLUSION:

The CSF, dated 03/15/04, for the basic formulation is not acceptable. The wider ranges for all components are acceptable. The registrant is trying to bridge for color. No indication of the source to bridge is mentioned. However, the registrant does not need to describe color since in MRID # 462253-03 describes the color of the product. Therefore, the information provided is acceptable. The registrant must comply with the requirements, recommendations and concerns listed above. The 830.6304 odor guideline is not applicable, since the Trichloro-s-triazinetrione, & Dichloro-s-triazinetrione RED shows that the odor is needed only for TGA.

## PRODUCT CHEMISTRY REVIEW

### 5. CONFIDENTIAL STATEMENT OF FORMULA

5a. Type of formulation and source registration

- Non-integrated formulation system ☒ [X]
- Are all TGAI used registered? Yes ☐ No ☐ NA ☒ [X]
- Integrated formulation system ☐ []
- if "ME-TOO", specify EPA Reg. # of existing product:

5b. Clearance of inerts for non-food or food use:

Cleared for food use under 40 CFR §180.1001: Yes ☐ No ☐ NA ☒ [X]

5c. Physical state of product: Solid.

5d. The chemical IDs and analytical information (including that for the TGAI), density, pH, and flammability are consistent with that given in 830.1000, Series A and 830.7300, .7000 and .6315 respectively: Yes ☐ No ☐ []

**Data has not been submitted to the reviewer.**

5h. NCs and CLs are: acceptable ☒ [x] Not acceptable ☐ []

5i. Active ingredient (s)	NC	UCL	LCL
A. Trichloro-s-triazinetriene	70.54	74.06	67.01
B. Dichloro-s-triazinetriene	14.55	15.57	13.53

5j. For products produced by an integrated formulation system:

- All impurities of toxicological significance have a UCL?  
Yes ☐ No ☐ Not applicable ☒ [X]
- All impurities of  $\geq 0.1\%$  in the product have been identified?  
Yes ☐ No ☐ Not applicable ☒ [X]

### 6. PRODUCT LABEL

6a. The active ingredients statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA? Yes ☒ [X] No ☐ []

6b. The formulation contains one of the following:

- 10% or more of a petroleum distillate: Yes ☐ No ☒ [X]
- 1.0% or more of methyl alcohol: Yes ☐ No ☒ [X]
- Sodium nitrite at any level: Yes ☐ No ☒ [X]
- a toxic List 1 inert at any level: Yes ☐ No ☒ [X]
- arsenic in any form: Yes ☐ No ☒ [X]

6c. If Yes to any of the above, does the inert ingredients statement contain a footnote indicating this? Yes ☐ No ☐ Not applicable ☒ [X]

6d. The appropriate warning statement regarding flammability or explosive characteristics of the product are listed on the label?

Yes [ ] No [ ] Not applicable [X]

6e. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice

83-3 for all other uses? PR Notice 84-1 Yes [ ] No [ ] Not applicable [X]

PR Notice 83-3 Yes [X] No [ ] Not applicable [ ]

6f. Does the product require an expiration date at which time the NC falls below the LCL (based on the one year storage stability data or other information)?

Yes [ ] No [ ] Pending [X]

7a. **PRODUCT CHEMISTRY (Series 830 Part A)**

	Acceptance of Information	MRID No.
830.1550 Chemical ID (See Appendix) <sup>1</sup>	A	462253-01
830.1600 Description of Materials	A	462253-01
830.1620 Manufacturing Process <sup>2</sup>	A	462253-01
830.1650 Formulation Method <sup>3</sup>	NA	
830.1670 Discussion of Impurities <sup>4</sup>	A	462253-01
830.1700 Analysis <sup>5</sup>	A	462253-01
830.1750 Certified Limits <sup>6</sup>	A	462253-01
830.1800 Analytical Method for AIs <sup>7</sup>	A	462253-01

Explanation: A=acceptable; N=not acceptable; NA=technically not applicable; NR= not required, G=data gap; U=requires upgrading; W=waived; E=EPA estimate.

<sup>1</sup>See Confidential Appendix A for additional information

<sup>2</sup>For MP/EP products produced by an integrated formulation system.

<sup>3</sup>For products from a TGAI or MP.

<sup>4</sup>May be waived unless actual/possible impurities are of toxicological concern.

<sup>5</sup>Five batch analysis required for products produced by an integrated formulation system.

<sup>6</sup>If different from standard CLS recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

<sup>7</sup>Abbreviate method used as follows: gas chromatography (GC), infrared (IR),

**Physical and Chemical Characteristics (Series 830, Part B)**

11b. <u>Physical/Chemical Properties*</u>	Acceptance of data	Value or qualitative description	MRID No.
830.6302 Color	A	blue-upper layer, white-lower layer	462253-03
830.6303 Physical State	A	granular/powder	462253-03
830.6304 Odor	G		
830.6313 Stability to normal & elevated temp., metals, & metal ions	NA		
830.6314 Oxidation/Reduction: chemical incompatibility.	A	Oxidizing agents	462253-04
830.6315 Flammability/Flash Pt	A	non-flamable	462253-04
830.6316 Explodability	A	non-explosive	462253-04
830.6317 Storage stability	A	33 days accelerated	462253-05
830.6319 Miscibility	NA		462253-04
830.6320 Corrosion characteristics	A	normal	462253-05
830.6321 Dielectric breakdown voltage	NA		
830.7000 pH	A	3.70 ± 0.4	462253-03
830.7050 UV/Visible absorption	NA		
830.7100 Viscosity	NA		
830.7200 Melting point/melting range	NA		
830.7220 Boiling point/ boiling range	NA		
830.7300 Density/sp. gravity	A	284.4 ± 0.3 per tablet	462253-03
830.7370 Dissociation constants in water	NA		
830.7520 Particle size, fiber length, & diameter distribution	NA		
830.7550 Partition coefficient(n-octanol/water), shake flask method	NA		
830.7560 Partition coefficient(n-octanol/water), generator column method	NA		
830.7570 Partition coefficient(n-octanol/water),	NA		
830.7840 Water solubility: Column elution method; shake flask method	NA		
830.7860 Water solubility, generator column method	NA		
830.7950 Vapor pressure	NA		

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G=data gap; U=requires upgrading; W=waived; E=EPA estimate.

<sup>1</sup>= Registrant must perform one year study.

\* Provide brief description, e.g., color--yellow or property value, e.g., density 1.25 g/cc;

Unless otherwise indicated, the property should be at 25°C.